

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DIANE BOND,)	
)	
Plaintiff)	
)	
v.)	
)	
CHICAGO POLICE OFFICERS EDWIN)	
UTRERAS (Star No. 19901), ANDREW)	No. 04 C 2617
SCHOEFF (Star No. 4436), CHRIST)	
SAVICKAS (Star No. 5991), ROBERT)	Judge Joan Humphrey Lefkow
STEGMILLER (Star No. 18764), JOSEPH)	
SEINITZ (Star No. 4947), ROBERT SHULTZ)	Magistrate Judge Ashman
(Star No. 13882), NICHOLAS CORTESI (Star)	
No. 15112), JOHN CANNON (Star No.)	
12241), and JOHN DOES ONE through FIVE,)	
in their individual capacities; and the CITY OF)	
CHICAGO,)	
)	
Defendants.)	
)	
)	

**PLAINTIFF’S REQUEST TO PRODUCE
DOCUMENTS TO DEFENDANT ROBERT STEGMILLER**

Plaintiff, by and through her attorney, CRAIG B. FUTTERMAN, and pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby requests that the Defendant ROBERT STEGMILLER, produce the following documents, objects, and tangible things within thirty days upon receipt of this request at the office of CRAIG B. FUTTERMAN, EDWIN F. MANDEL LEGAL AID CLINIC, 6020 South University, Chicago, IL 60637.

DEFINITIONS

As used herein, the below-listed terms shall have the following meanings unless otherwise specified or unless otherwise required by the context in which the term is used.

A. "Plaintiff" means Diane Bond.

DOCUMENTS TO BE PRODUCED

1. Any and all notes, documents, reports, statements or other paperwork that you drafted (in whole or in part), reviewed, or possess related to the Plaintiff.
2. Any and all documents, reports, notes, logs, unit query reports, daily activity reports or calendars (whether in paper or electronic form), that reflect your activities on April 13, 2003, April 19, 2003, April 28, 2003, April 30, 2003, March 29, 2004, March 30, 2004, April 7, 2004, May 3, 2004, and April 25, 2000.
3. Any and all documents referred to in your answers to Plaintiff's interrogatories.
4. Any and all documents related to the allegations in Plaintiff's Complaint or any of the Answers or affirmative defenses filed by any of the Defendants. This request includes, but is not limited to, any and all reports of telephone calls to and from Defendants, radio communications, tape recordings, electronic communications including "personal data transmissions," event query reports, unit query reports, general incident or case reports, evidence technician reports, crime scene processing reports, arrest reports, general progress reports, supplemental reports, daily activity reports, supervisor management logs or reports, watch commander logs or reports, to/from reports, field contact cards, use of force reports, drafts of any reports, notes, street files, roll call records, attendance and assignment records, watch assignment sheets, lock-up keeper reports, search or arrest warrants, applications or supporting affidavits to attempt to obtain a warrant, photographs, inventory sheets or reports, evidence or recovered property (E.R.P.S.)

10. Any and all documents related to any disciplinary complaints or proceedings against you in your employment (including but not limited to the Chicago Police Department) and in any post-high school educational institution.

11. Any and all documents or communications relating to your roll calls, assignments, or details on April 13, 2003, April 19, 2003, April 28, 2003, April 30, 2003, March 29, 2004, March 30, 2004, April 7, 2004, May 3, 2004, and April 25, 2000.

12. Any and all documents related to Plaintiff Diane Bond, including but not limited to photographs, police reports, personal notes, documents related to Plaintiff's alleged injuries in this case, medical records, and employment records.

13. Any and all physical evidence or demonstrative aids (including but not limited to charts, diagrams, photographs, models, or sketches) that relate to the incidents alleged in Plaintiff's Complaint or the Answers or Affirmative Defenses of Defendants, or that any of the Defendants may offer at trial.

14. Any and all documents received by any defendant pursuant to any subpoena or records deposition in this case.

15. Copies of your federal and state income tax returns together with all schedules and attachments thereto (including W-2 forms) for the years 2000 through the present.

16. Any and all documents reflecting any ownership interest in real property or other capital assets anytime between January 2000 and the present.

26. Any and all records relating to the transfer by sale or gift of quit-claim deed of any real or personal property valued at \$1000 or more in which you had any ownership interest at any time between January 1994 and the present.

27. Any and all insurance policies in which you have an ownership interest or of which you are a beneficiary.

Respectfully Submitted



One of Plaintiff's Attorneys

Date: October 8, 2004

Craig B. Futterman
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